

POMERANTZLLP

Jeremy A. Lieberman
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March 1, 2017

VIA ECF

Hon. Jesse M. Furman
United States District Judge
United States District Court,
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: *Susan Dube v. Signet Jewelers Limited, et al.*, Case No. 16-cv-6728 (JMF);

Dear Judge Furman:

We represent Susan Dube and Lyubomir Spasov (the “Lead Plaintiffs”) in the above-captioned action (the “Action”). On January 30, 2017, Lead Plaintiffs filed the Amended Complaint for Violations of Federal Securities Laws (the “Amended Complaint”) (Dkt. No. 28) in the Action. On February 28, 2017, reports emerged that detailed claims by hundreds of employees of Signet of widespread sexual harassment and discrimination in the workplace that existed in the period during which the events at issue in the Amended Complaint took place. Defendant Mark Light was among the individuals implicated in the claims.

In response to these recent developments, Lead Plaintiffs now seek to file a second amended complaint in the Action (the “Second Amended Complaint”) in order to add additional factual allegations and/or claims. Defendants have agreed that, subject to Court approval, Lead Plaintiffs may file the Second Amended Complaint.

We have discussed the proposed amendment of the Amended Complaint with the Defendants, and have been authorized to inform Your Honor that: “While Defendants do not agree with the above description of recent events, and disagree as to whether any claims, new or old, are legally sufficient under the federal securities laws, Defendants believe that addressing all claims in one amended complaint and one motion to dismiss is the most efficient way to proceed.”

We write to request that the Court grant leave to Lead Plaintiffs to file a Second Amended Complaint and, in accordance with Sections 1.E and 3.A of Your Honor’s Individual Rules, that the Court set a briefing schedule for the Second Amended Complaint. In order for the Lead Plaintiffs to have adequate time to add additional allegations and/or claims in the Second Amended Complaint, and for the parties to have adequate time to raise and respond to arguments for dismissal of the claims and allegations included in the Second Amended Complaint, the parties respectfully request that the Court “so order” the enclosed briefing schedule agreed to by the parties, copied here for reference:

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1. Lead Plaintiffs are granted leave to file a second amended complaint (the “Second Amended Complaint”) on or before April 3, 2017;
2. Defendants shall answer or otherwise respond to the Second Amended Complaint by May 19, 2017;
3. If Defendants move to dismiss the Second Amended Complaint, Lead Plaintiffs shall file any opposition to such motion on or before July 3, 2017, and Defendants shall file any reply in support of such motion on or before August 2, 2017.

The parties have made no prior request for an extension of a briefing schedule for the Second Amended Complaint. We are available at the Court’s convenience to discuss any of these matters.

Respectfully Submitted,

POMERANTZ LLP

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*Attorneys for Lead Plaintiffs Susan Dube
and Lyubomir Spasov*

cc: All counsel of record (via ECF)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SUSAN DUBE,

Plaintiff,

-v-

SIGNET JEWELERS LIMITED, *et al.*,

Defendants.

No. 1:16-cv-06728-JMF

STIPULATION AND [PROPOSED] ORDER

This stipulation is entered into in the above-captioned action (the “Action”) by and among Susan Dube and Lyubomir Spasov (collectively, “Lead Plaintiffs”) and Signet Jewelers Limited, Mark Light and Michele Santana (collectively, “Defendants,” and together with Lead Plaintiffs, the “Parties”).

WHEREAS, on November 11, 2016, the Court entered an Order (Dkt. No. 25) that granted Lead Plaintiffs until January 30, 2017 to file an amended complaint in the Action, and set forth a schedule for the answer or for motion practice in response to that amended complaint;

WHEREAS, on January 30, 2017, Lead Plaintiffs filed the Amended Complaint for Violations of Federal Securities Laws (the “Amended Complaint”) (Dkt. No. 28) in the Action;

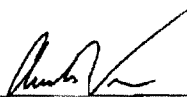
WHEREAS, Lead Plaintiffs, in light of recent developments, now seek to file a second amended complaint in the Action (the “Second Amended Complaint”) in order to add additional factual allegations and/or claims;

WHEREAS, the Parties have conferred and agreed to a schedule, subject to Court Approval, for Lead Plaintiffs’ time to file a Second Amended Complaint and for Defendants’ time to answer or otherwise respond to the Second Amended Complaint;

ACCORDINGLY, IT IS HEREBY STIPULATED, AGREED, AND ORDERED THAT:

1. Lead Plaintiffs are granted leave to file a second amended complaint (the "Second Amended Complaint") on or before April 3, 2017;
2. Defendants shall answer or otherwise respond to the Second Amended Complaint by May 19, 2017;
3. If Defendants move to dismiss the Second Amended Complaint, Lead Plaintiffs shall file any opposition to such motion on or before July 3, 2017, and Defendants shall file any reply in support of such motion on or before August 2, 2017.

Dated: March 1, 2017

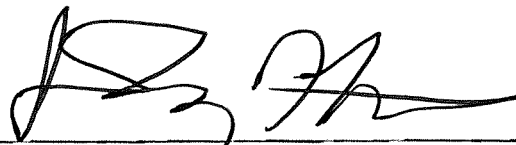


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*Attorneys for Defendants Signet Jewelers
Limited, Mark Light and Michele Santana*

SO ORDERED

HON. J. JESSE M. FURMAN